

Before the
Federal Communications Commission
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Application by Verizon Pennsylvania, Inc.)
for Authorization Under Section 271)
of the Communications Act to Provide)
In-Region, InterLATA Service in the State)
of Pennsylvania)

CC Docket No. 01- 138

Comments of

World Institute on Disability
American Association of People with Disabilities
American Council of the Blind
Pennsylvania Society for the Advancement of the Deaf, Inc.

July 11, 2001

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The undersigned organizations are pleased to support the following comments in support of Verizon Communication's application to provide long distance service in the state of Pennsylvania. We are confident that Verizon's entrance into the long distance market will not only bring consumers the benefits of increased competition but also will enhance and extend Verizon's ability and commitment to making communications technologies available to consumers with disabilities.

I. Statement of Interest

World Institute on Disability (WID) is a private, nonprofit organization that serves as a research, training and public policy development center for the disability rights and independent living movements. Its board of directors and staff are predominately people with a wide variety of disabilities and its work focuses on policy areas that are critical to the integration of people with disabilities into society. WID's Division on Technology Policy serves as a resource for disability organizations and individual activists who believe that people with disabilities can be empowered through technology. Its work centers search for ways to remove and prevent barriers to such use in the design of technology.

American Association of People with Disabilities (AAPD) is a national cross-disability membership organization. It was created to represent the common interests of the entire disability community, to unify the diverse approaches that have developed over the years and to provide direct consumer and organizational input on significant issues.

American Council of the Blind (ACB) is the nation's leading membership organization of blind and visually impaired people. It was founded in 1961 and incorporated in the District of Columbia. The Council strives to improve the well-being of all blind and visually impaired people by: serving as a representative national organization of blind people; elevating the social, economic and cultural levels of blind people; improving educational and rehabilitation facilities

and opportunities; cooperating with the public and private institutions and organizations concerned with blind services; encouraging and assisting all blind persons to develop their abilities; and conducting a public education program to promote greater understanding of blindness and the capabilities of blind people.

Pennsylvania Society for the Advancement of the Deaf, Inc. (PSAD) is a statewide non-profit advocacy organization that promotes and improves the quality of “everyday” life in education, employment, communication, health, community life and legislation. The organization, incorporated in 1891, has been a state association under the National Association of the Deaf since 1968.

II. Comments

Over the past year, the successful entry into the long distance markets by Verizon (formerly Bell Atlantic) in New York and by SBC in Texas has demonstrated that there is not only a need for greater competition in the long distance marketplace, but that the Bell Operating Companies are fully capable of satisfying that need and meeting the strict requirements for 271 approval to do so.

Verizon’s entry into long distance service in New York has enabled New York consumers to finally enjoy the benefits of competition promised by the Telecommunications Act of 1996. Verizon introduced a number of simple and affordable long distance calling plans in New York and as a result over 1 million consumers switched to Verizon in the first eight months its services were available. For example, Verizon offers several calling plans to New York consumers with rates as low as 5 cents a minute during off-peak hours as well as plans with no minimum charges. In addition, Verizon remains committed to its low-volume customers, those that most long distance companies find unattractive. For these consumers, Verizon offers a low-

cost plan with no monthly fees or minimum usage fees. Similarly, Verizon's filing for authorization to provide long distance service in the state of Pennsylvania can only further a competitive environment and help bring the benefits of competition to Pennsylvania consumers.

As important as the benefits of competition are, e.g., more choice and better service, what matters most to our constituents is accessibility. Too often, companies in the rush to offer customers the latest, most exciting new telecommunications or Internet-based services have overlooked the needs of consumers who cannot see, hear, move or process information in the same way as the majority of the consumer market. Verizon has been a leader in its efforts to ensure that the needs of customers with disabilities are not consciously or unconsciously disregarded. Specifically, the company has pro-actively been involved in the following issues of the disability community:

- Bell Atlantic was the first regional Bell company to implement 711 access throughout its service territory and undertook this effort at its own expense. Verizon is working to continue this commitment. It is cooperating with the local public service commissions and the dominant carriers in its GTE states to implement 711 as mandated by the FCC.
- Verizon offers accessible billing in Braille or large print formats in a majority of its service areas and is in the process of rolling out these alternative formats to those areas not yet covered. In addition, the company has been testing an accessible on-line billing option.
- Verizon has adopted as a best practice the Universal Design principles that commit the company to fostering accessibility company-wide and with the companies with which it does business.

- Verizon encourages internal examination of disability issues through its support of DIAL (Disability Issues Awareness Leaders), an employee resource group which advocates on behalf of employees and customers.
- Verizon has engaged in a continuous dialogue with national and local disability-related organizations. Verizon is a frequent sponsor of these organizations' national conferences and regional activities and includes representatives of the disability community on its local and regional consumer advisory boards.
- Verizon has committed to accessibility for its internal and external Web pages and has created specific pages that address the needs of customers with disabilities. The company has also offered packages of products and services specifically geared to the communities of blind, deaf and hard-of-hearing individuals. These include a Talking Caller-ID/home voice mail package and a Caller-ID/Call Waiting package featuring a flash-button-equipped Caller ID box that enables TTY users to switch between incoming calls.

No company is perfect in its efforts to ensure accessibility. But we recognize that Verizon is taking steps as a leader in the telecommunications industry in terms of accessibility issues. We are confident that Verizon's ability to provide long distance service in Pennsylvania will only strengthen its commitment and ability to make its communications technologies available and accessible to all consumers, including those with disabilities.

We believe that Verizon's ability to enter the long distance market in Pennsylvania will not only bring consumers the benefits of increased competition but will enhance Verizon's ability to make all of its products and services accessible to consumers with disabilities. We also know that people with disabilities can greatly benefit from the deployment of advanced

telecommunications capabilities. Advanced technologies can expand life-long learning opportunities, employment prospects, increase the quality of health care, promote independent living and reduce isolation for people with disabilities. We, therefore, recommend that the FCC approve Verizon's application to provide long distance service in the state of Pennsylvania.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Deborah Kaplan", with a stylized flourish at the end.

Deborah Kaplan
Executive Director
World Institute on Disability
510 16th Street, Suite 100
Oakland, CA 94612

Andrew J. Imparato
President and CEO
American Association of People with Disabilities
1819 H Street NW, Suite 330
Washington DC, 20006

Charles Crawford
Executive Director
American Council of the Blind
1155 15th Street, NW, Suite 1004
Washington, DC 20005

Steven A. Florio
President
Pennsylvania Society for the Advancement of the
Deaf, Inc.
102 Hearth Road
Broomall, PA 19008